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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**TIANA TOZER, PHILIP RHODES,  
BARBARA JACOBSEN, DANE  
SOUTHARD, LORIEN ILENA  
WELCHOFF, PAULINE LONG, MARK  
BARNHILL, STEVE JACKSON, KEITH  
MARTIN, and STEVEN REBISCHKE on  
behalf of themselves and all others similarly  
situated,**  
**Plaintiffs,**

**3:22-cv-01336-MO**

**DECLARATION OF NAOMI SHEFFIELD**

(In Support of Defendant City of Portland's  
Unopposed Motion for Extension of Time to  
File Responsive Pleading)

v.

**CITY OF PORTLAND,**  
**Defendant.**

I, Naomi Sheffield, being first duly sworn, do depose and say:

1. I am the attorney representing City of Portland in the above-entitled matter and I make this declaration in support of defendant's request for an extension of time in which to file an initial appearance.

2. Plaintiffs filed this case in the United States District Court for the District of Oregon on September 6, 2022.

3. Defendant City of Portland waived service of the Summons and Complaint on September 7, 2022.

4. Counsel for the parties have met regularly since the Complaint was filed. This includes meetings on September 20 and 27, and October 11, 2022.

5. Defendant seeks this extension of time because the parties are currently conferring on a resolution in this matter, which may render a responsive pleading or motion unnecessary. Given these ongoing discussions, counsel for the City requires additional time to prepare and file Defendant's responsive pleading or motion should it be necessary.

6. I have conferred with Plaintiffs' counsel, and Plaintiffs' attorneys, John DiLorenzo, Jr., Aaron K. Stuckey, Chris Swift and Seth R. Tangman, have no objection to this request for an extension of time.

7. This motion is presented in good faith and not for reasons of delay.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

DATED: October 26, 2022

/s/ Naomi Sheffield  
Naomi Sheffield